

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OUSMANE BAH,
Plaintiff

v.

Docket No. 1:19-cv-03539-PKC

APPLE CORPORATION,
SECURITY INDUSTRY
SPECIALISTS, INC.,
STEVEN YHAP, Individually and as
An employee of SECURITY INDUSTRY
SPECIALISTS, INC.,
JOHN WOODRUFF, Individually and as
An employee of SECURITY INDUSTRY
SPECIALISTS, INC.,
DETECTIVE JOHN REINHOLD, Individually and as
a detective for the NEW YORK POLICE DEPARTMENT,
JOHN DOES 1-3, unidentified officers of the
NEW YORK POLICE DEPARTMENT, and
CITY OF NEW YORK, by and through
THE NEW YORK POLICE DEPARTMENT,

Defendants

**MOTION TO RETROACTIVELY SEAL CONFIDENTIAL
DOCUMENT**

Plaintiff hereby moves that this Court retroactively seal Exhibit 2 to the Letter to Judge Castel dated July 27, 2020 (ECF No. 76), for the grounds stated in the attached Memorandum of Law and accompanying Affidavit of Counsel. Plaintiff represents that the document was produced inadvertently and was marked Confidential, and should therefore be sealed under this Court's Protective Order in this matter.

Plaintiff,
By his attorneys,



Daniel Malis, Esq., BBO # 315770
MALIS | LAW
30 2nd Street
Cambridge, MA 02141
(617) 491-1099
daniel.malis@malislaw.com



Subhan Tariq, Esq.
Attorney I.D. # ST9597
The Tariq Law Firm
34-18 Northern Blvd. Ste. 2-25
Long Island City, NY 11101
(718) 674-1256
subhan@tariqlaw.com

Dated: July 29, 2020